

# Exhibit A

**Exhibit A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 2:23-cv-14379-KMM**

AFFORDABLE AERIAL PHOTOGRAPHY INC.  
a Florida corporation,

Plaintiff,

v.

SYNC RFID INC,  
a Florida corporation,

Defendant.

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**DECLARATION OF GRIFFIN C. KLEMA, ESQ. IN SUPPORT OF DEFENDANT SYNC  
RFID'S MOTION FOR EXTENSION OF TIME**

I, Griffin C. Klema, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 of the following is true and correct:

1. I am counsel for defendant Sync RFID Inc. in this matter. I submit this declaration in support of Sync RFID's motion for extension of time to respond to plaintiff Affordable Aerial Photography's complaint.

2. I am a true solo practitioner, and my firm does not employ any associate attorneys and I do not have any partners. Nor do I employ a paralegal. All legal work is performed by me.

3. On Thursday, December 14, 2023, Sync RFID engaged me to defend it this lawsuit. Since mid-2023, my family and I had a pre-planned vacation to Wisconsin starting December 21, 2023, and concluding on Sunday January 7, 2024. Between the four business days when Sync RFID engaged me and when I departed from Florida, I had other preexisting client and personal matters on my calendar, and could not devote adequate time to evaluate Sync RFID's defense and prepare a response to the complaint.

4. Given the timing of my absence combined with the deadline for a response to AAP's complaint, I requested an extension of time from AAP's counsel, attorney Daniel DeSouza, on December 28, 2023, by email at 9:43 AM CST, after attempting to speak with Mr. DeSouza by telephone and leaving a message with CopyCat Legal's receptionist at 9:37 AM CST.

5. Mr. DeSouza responded by email stating that he "spoke with Robert. He did not consent, so I guess you'd need to file as opposed." Despite requesting the basis for the refusal and what prejudice would result to AAP with a reasonable extension of time given the circumstances, none was forthcoming. Mr. DeSouza entirely abdicated the matter to his client. Mr. DeSouza refused to recognize any obligation on his part as counsel on matters of extensions of time nor would he articulate any prejudice to his client. When I further confronted him with The Florida Bar Professionalism Standard 6.4, he had no response or argument for why he and Mr. Stevens refused. My call logs and email communications with Mr. DeSouza can be provided upon request.

Dated: December 29, 2023.

/s/ Griffin Klema  
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